

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Wilmington Trust, National Association, as Trustee
for the Registered Holders of Wells Fargo
Commercial Mortgage Securities, Inc., Multifamily
Mortgage Pass-Through Certificates, Series 2019-
SB65,

Plaintiff,

v.

Kunba, LLC, Robert Khomari, The New York City
Department of Housing Preservation and
Development, County Oil Company, Inc. and John
Doe No. I through John Doe No. XXX, inclusive, the
last thirty names being fictitious and unknown to
Plaintiff, the persons or parties intended being the
tenants, occupants, persons, or corporations, if any,
having or claiming an interest in or lien upon the
premises described in the Complaint,

Defendants.

Case No.

FED. R. CIV. P § 7.1 DISCLOSURE STATEMENT

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and General Order No. 157, Plaintiff states that it is a trust that has elected to be treated as a real estate mortgage investment conduit (“REMIC”) under the Internal Revenue Code of 1986 and that its trustee, Wilmington Trust N.A., is a national banking association organized under federal law. Wilmington Trust N.A. is the real party-in-interest. A national banking association is a citizen of the state where the bank has its main office. *Wachovia Bank, N.A. v. Schmidt*, 546 U.S. 303 (2006). The main office of Wilmington Trust N.A. is in Wilmington, Delaware, and Plaintiff is a citizen of Delaware for purposes of federal diversity jurisdiction. Wilmington Trust N.A. is a wholly owned subsidiary of M&T Bank. M&T Bank is a publicly traded bank holding company.

Dated: New York, New York
February 27, 2025

Respectfully Submitted,

POLSINELLI PC

By: /s/ Carter J. Wallace
CARTER J. WALLACE
600 Third Avenue, 42nd Floor
New York, New York 10016
(212) 803-9914
cwallace@polsinelli.com

ATTORNEYS FOR PLAINTIFF